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*Attorneys for Plaintiff**Johnson & Johnson Health Care Systems Inc.***UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY****JOHNSON & JOHNSON****HEALTH CARE SYSTEMS INC.,**

Plaintiff,

v.

**SAVE ON SP, LLC, EXPRESS
SCRIPTS, INC., AND ACCREDO
HEALTH GROUP, INC.,**

Defendants.

COUNSEL:

:

Civil Action No. 22-2632(CCC)(CLW)

:

Hon. Claire C. Cecchi, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J.

:

Hon. Freda L. Wolfson, Special Master

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NOTICE OF MOTION TO SEAL

PLEASE TAKE NOTICE that on May 5, 2025 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Johnson

& Johnson Health Care Systems Inc. (“JJHCS”), together with counsel for Defendants Save On SP, LLC (“SaveOnSP”) and Express Scripts, Inc. (“ESI”), will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with SaveOnSP’s Motion to Compel JJHCS to Produce Documents from the PAFA+ Database, dated January 29, 2025, with related briefing dated February 12 and February 24, 2025 (ECF Nos. 511, 526, & 554), filed February 5, February 13, and March 11, 2025 (the “PAFA+ Motion”); and
- (b) Permitting JJHCS to file the proposed public versions of the PAFA+ Motion, ECF Nos. 511, 526, & 554, attached as Exhibits A, B, and C to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration, the Declaration of E. Evans Wohlforth, Jr., and the Declaration of Mark A. Berman and their respective indices in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

Dated: April 10, 2025

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